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7 8 9 10	VALENTI LAW, APC MATT VALENTI, ESQ. 5252 Balboa Avenue, Suite 700 San Diego, California 92117 Telephone: (619) 540-2189 mattvalenti@valentilawapc.com			
11	Attorneys for Plaintiff AHMED AL-KUBAISI			
12				
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA			
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16	AHMED AL-KUBAISI,	CASE NO. 3:25-cv-02970-AGT		
17	Plaintiff,	SECOND STIPULATION AND [PROPOSED] ORDER TO EXTEND THE TIME FOR		
18	V.	DEFENDANTS TO FILE ANSWER TO THE COMPLAINT		
19	HARBOR FREIGHT TOOLS CORPORATE, LLC; RUE-ELL ENTERPRISES, INC.,	Complaint Filed: March 31, 2025 Answer Due: June 2, 2025		
20 21	Defendants.	New Deadline: June 10, 2025		
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23	STIDIH ATION			
24	STIPULATION Districts Allmed Al Kudansi (SDIstricts) and Defendance HARDOR EDEICHT			
25	Plaintiff AHMED AL-KUBAISI ("Plaintiff") and Defendants HARBOR FREIGHT.			
26	TOOLS CORPORATE, LLC and RUE-ELL ENTERPRISES, INC. ("Defendants") – Plaintiff and			
27	Defendant together the "Parties" – hereby make the following joint stipulation for an extension of			
28	time to allow Defendants to respond to the Co	mpianit.		
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1	1. W	HEREAS the Parties have agreed to an extension of time for Defendants to
2	respond to the C	omplaint to and including June 10, 2025;
3	2. W	HEREAS the Parties have worked together before on several other cases, and
4	have resolved ca	ses efficiently;
5	3. W	VHEREAS the Parties intend to do so here;
6	4. W	HEREAS, the Defendants need more time to finalize the responsive pleading;
7	5. W	WHEREAS, the Defendants are also finalizing initial investigations to assist in
8	potential settlement negotiations;	
9	6. W	HEREAS, pursuant to Civil Local Rule 6-1, this extension will not alter the date
10	of any event or any deadline already fixed by Court order.	
11	IT IS SO STIPULATION:	
12	That Defe	endant shall have to and including June 10, 2025 to respond to the Complaint.
13		
14	Date: May 21, 20	025 VALENTI LAW, APC
15		/s/ Matt Valenti
16		By MATT VALENTI, Esq. Attorney for Plaintiff
17		AHMED AL-KUBAISI
18	Date: May 21, 20	JEFFER MANGELS BUTLER & MITCHELL LLP
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20		The Department of the Control of the
21		By MARTIN H. ORLICK, Esq. CHRISTOPHER K. WHANG
22		Attorney for Defendants HARBOR FREIGHT TOOLS CORPORATE, LLC and RUE-ELL
23		ENTERPRISES, INC.
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1	FILER'S ATTESTATION
2	Pursuant to Local Rule 5-1, I hereby attest that on May 21, 2025, I, Christopher K.
3	Whang, attorney with Jeffer Mangels Butler & Mitchell LLP, received the concurrence of Matt
4	Valenti, Esq. to the filing of this document.
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6	Christopher K. Whang
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1	[PROPOSED] ORDER		
2	Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.		
3	The case deadlines are continued as follows:		
4	The deadline for Defendants HARBOR FREIGHT TOOLS CORPORATE, LLC and		
5	RUE-ELL ENTERPRISES, INC. to file a responsive pleading is June 10, 2025.		
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8	Dated: June, 2025 Honorable Alex G. Tse		
9	U.S. District Court Judge, Northern District		
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